

# EXHIBIT A

**EXHIBIT A TO SUBPOENA TO  
WILLIAMSON COUNTY ATTORNEY'S OFFICE**

**Instructions Applicable to Exhibit A**

Any electronic documents responsive to this Subpoena shall be produced in PDF or TIFF image file format, with extracted text (the ASCII text of an electronic document file), and with a load file that identifies, among other things, any parent-child relationship existing between a document and its attachments. If, upon review of a produced document in PDF/TIFF image format, Round Rock Independent School District ("Round Rock ISD" or the "District") determines that the production of the native file (e.g., Microsoft Excel files, Microsoft Access files, and/or other databases and associated files) is necessary because the PDF/TIFF image does not properly capture the contents of the document, the document shall be produced in its native electronic format.

**Definitions Applicable to Exhibit A**

In responding to this Subpoena, the following definitions shall apply, regardless of whether upper or lowercase letters are used:

1. The term "Williamson County" shall mean Williamson County, Texas and all its departments, offices, and divisions—including but not limited to the Williamson County Judge, Williamson County Commissioners Court, Williamson County Attorney, Williamson County Magistrate's Office, and Williamson County Sheriff—as well as all its present and former agents, employees, attorneys, representatives, heirs and assigns.
2. The term "Williamson County Attorney" shall mean the Williamson County Attorney's Office and all its divisions, as well as all its present and former agents, employees, attorneys, representatives, heirs and assigns.
3. The terms "Williamson County Magistrate" or "Williamson County Magistrate Judge Alexandra Gauthier" shall mean the Williamson County Magistrate's Office and its present and former judges, agents, employees, attorneys, representatives, heirs and assigns.
4. The term "Williamson County Sheriff" shall mean the Williamson County Sheriff's Office and its present and former officers, agents, employees, attorneys, representatives, heirs and assigns.
5. The term "Williamson County Judge" shall mean the Williamson County Judge of the Williamson County Commissioner's Court and its present and former judges, agents, employees, attorneys, representatives, heirs and assigns.

6. The term “Round Rock ISD” or “District” shall mean the Round Rock Independent School District and its present and former trustees, agents, employees, attorneys, representatives, heirs and assigns.

7. The terms “Jeremy Story” or “Story” shall mean Jeremy Wade Story, whose date of birth is [REDACTED], whose Texas Driver’s License number is [REDACTED], and whose partial Social Security Number is \*\*\*-\*\*-\*\*\*\*.

8. The terms “Dustin Clark” or “Clark” shall mean Dustin Kansas Clark, whose date of birth is [REDACTED], and whose Texas Driver’s License number is [REDACTED].

9. “And” shall mean “and/or.”

10. “Communication” or “Communications” shall mean any contact or act by which information or knowledge is transmitted or conveyed between two or more persons and includes, without limitation: (1) written contact, whether by letter, memoranda, e-mail, telegram, telex, text or instant message, or other document; (2) oral contact, whether by face-to-face meetings, telephone conversations or otherwise; and (3) nonverbal acts intended to communicate or convey any meaning, understanding, or other message.

11. “Document” refers to all writings of any kind, including the originals and all non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise, including, without limitation, correspondence, memoranda, notes, diaries statistics, letters, electronic mail, telegrams, minutes, contracts, reports, studies, text, statements, receipts, returns, summaries, pamphlets, books, prospectuses, inter-office and intra-office Communications, offers, notations of any sort regarding conversations, telephone calls, meetings or other Communications, bulletins, printed matters, computer printouts, teletypes, telefax, invoices, worksheets, and each and every electronic or paper draft, alteration, modification, change or amendment of any kind of the foregoing; graphic or aural records and oral representations of any kind, including, without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings, motion pictures; and electronic, magnetic, mechanical or electric records or representations of any kind, including, without limitation, tapes, cassettes, disks, computer generated or stored information and recordings. The term “Document” expressly includes electronically stored information as referenced in the Federal Rules of Civil Procedure. To the extent Documents are produced pursuant to this discovery request, all Documents should be produced without alteration and with any and all exhibits and attachments thereto.

12. “Or” shall mean “and/or.”

13. “Reflect,” “Reflects,” or “Reflecting” shall mean, in addition to its customary and usual meaning, evidencing, showing or recording.

14. “Relate,” or “Relates,” or “Relating” shall mean, in addition to its customary and usual meaning, discussing, referring to, pertaining, reflecting, showing, or recording.

15. If any document or communication has been destroyed, you are requested to designate a person or persons to detail the circumstances of and reasons for such destruction and to produce all documents which relate to either the circumstances of, or reasons for, such destruction.

16. Confidential information, such as Jeremy Story's or Dustin Clark's Social Security Numbers, driver's license number, and dates of birth are not requested and may be redacted. Other information that you believe is confidential may be designated "Confidential."

17. Any documents or communications withheld on a claim of privilege must be preserved. If any documents or communications are withheld or other information is withheld pursuant to a claim of privilege or subject to protection as trial-preparation material, you shall:

- a. expressly state the privilege, privileges, or other protection asserted;  
and
- b. describe the nature of the documents, communications, or tangible things not produced or disclosed—and do so in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the claim.

18. Unless otherwise indicated, these document requests cover the time period beginning May 1, 2021, and continuing thereafter.

### **DOCUMENTS REQUESTED**

1. Documents and communications related to the warrant applications for the arrests of Jeremy Story and Dustin Clark submitted on or about September 17, 2021.
2. Documents and communications related to the issuance of the warrants for arrests of Jeremy Story and Dustin Clark by Williamson County Magistrate Judge Alexandra Gauthier on or about September 17, 2021.
3. Documents related to the prosecutions of Jeremy Story and Dustin Clark by the Williamson County Attorney for violations of Texas Penal Code Section 38.13, Hindering Proceedings by Disorderly Conduct, including:
  - a. Pleadings filed in the cases against Jeremy Story and Dustin Clark;
  - b. Any discovery exchanged between the Williamson County Attorney and Jeremy Story or Dustin Clark;
  - c. Evidence gathered by the Williamson County Attorney in support of the prosecutions of Jeremy Story or Dustin Clark; and
  - d. Communications between the Williamson County Attorney and counsel for Jeremy Story or Dustin Clark.
4. Documents related to the disposition of any Williamson County Attorney prosecutions of Jeremy Story and Dustin Clark.
5. Documents or data showing the number of prosecutions by the Williamson County Attorney for violations of Texas Penal Code Section 38.13, Hindering Proceedings by Disorderly Conduct in the ten years immediately preceding Story's prosecution.
6. Documents or data showing the disposition of all prosecutions by the Williamson County Attorney for violations of Texas Penal Code Section 38.13, Hindering Proceedings by Disorderly Conduct in the ten years immediately preceding Story's prosecution.
7. Documents and communications related to the arrests and detentions of Jeremy Story and Dustin Clark by the Williamson County Sheriff on or about September 17, 2021, including communications with the Williamson County Magistrate, the Williamson County Judge, or any other Williamson County employee or official.
8. Documents and communications related to booking Jeremy Story and Dustin Clark in the Williamson County Jail on or about September 17, 2021, including any issuance of bail/bond, booking protocols (including COVID-19 booking protocols) of the Jail, and their release from Jail.
9. Video or audio recordings related to the arrests or detentions of Jeremy Story and Dustin Clark on or about September 17, 2021, including bodycam footage.

10. Documents and communications evidencing or relating to any complaints, reports, grievances, or requests for public information by Jeremy Story or Dustin Clark to the Williamson County Attorney regarding their arrests or detentions on or about September 17, 2021, their prosecutions by the Williamson County Attorney, or their treatment by Round Rock ISD, including but not limited to Story's complaint to John McKinney at the Williamson County Attorney's Office on or about August 18, 2021, and any subsequent investigation.
11. Communications between the Williamson County Attorney, Williamson County Magistrate, Williamson County Judge, or anyone else at Williamson County regarding Jeremy Story or Dustin Clark and their complaints against Round Rock ISD, as well as related documents.
12. Communications between the Williamson County Attorney and anyone at Round Rock ISD related to Jeremy Story or Dustin Clark.
13. Communications between the Williamson County Attorney, Williamson County Magistrate, Williamson County Judge, or anyone else at Williamson County and Round Rock ISD Trustees Danielle Weston or Mary Bone regarding Jeremy Story or Dustin Clark.
14. Documents and communications evidencing or reflecting all requests for public information by Jeremy Story or Dustin Clark to the Williamson County Attorney, including all documents and communications the Williamson County Attorney produced or sent to Story or Clark in response to those public information requests.